

REMARKS

The Examiner's action dated February 14, 2006, has been received, and its contents carefully noted.

Regarding the observation presented at the top of page 2 of the Action, the examiner is authorized to add appropriate section headings if he believes that this would improve the specification.

The indication of allowability of claim 4 is noted with appreciation.

All of the rejections presented on pages 3-10 of the Action are traversed for the reason that the rejected claims, and particularly independent claim 1, distinguish patentably over all of the applied references.

It is noted that claims 1 and 2 have been rejected on four different prior art grounds. While it is understood that there are occasions where the presentation of an alternative ground of rejection is appropriate, the examiner is asked to keep in mind that the presentation of four different prior art rejections of a single claim places an undue burden on applicant.

The present invention is directed to a pressing iron having a water reservoir provided with a filling opening located on the rear face of the iron so that filling of the reservoir is carried out by holding the iron rocked forward,

the reservoir is in communication with a drip device plug disposed in the front part of the iron and feeding steam chamber, and the drip device plug is fed by a canalization opening near the rear of the reservoir.

This combination of features is not disclosed in Fauveau, or in Biancalani, and is not suggested by any reasonable combination of Augustine and Morton or of Debourg and Morton.

Fauveau discloses a pressing iron having a water reservoir integrated into the handle and having a filling orifice 8 situated at the rear face of the handle so that filling of the iron is effectuated by holding the iron rocked forward. The reservoir communicates with a drip device plug 12 that is located within the reservoir (in the handle) for supplying water to a steam chamber 4.

Contrary to the assertion presented in support of the rejection, the element 23 is a screw that does not constitute a drip device plug, or any part of a drip device plug. Screw 23 cooperates with a conical element 22 in order to regulate the cross-section of the passage for steam generated in chamber 4, chamber 4 being thus located upstream of element 24. The only element disclosed in this reference that can be equated to the claimed drip device plug is element 12 shown in Fig. 1 of the reference drawing.

It should be particularly noted that element 24 of Fauveau is not a steam-producing chamber and there is nothing in the disclosure of this reference that suggests that water can enter the space represented by element 24.

Thus, claim 1 distinguishes over this reference by its recitation of a drip device plug "disposed in the front part of the iron"; in the reference, drip device 12 of the reference is located at the rear of the iron.

Claim 1 further distinguishes over this reference by its recitation that "said drip device plug is fed by a "canalization (8) opening near the rear of the reservoir"; in the reference, the relation is reversed in that plug 12 feeds the tube 6, which the Examiner equates to the claimed canalization, and plug 12 is fed directly from the reservoir.

Thus, the structure defined in claim 1 differs totally from that disclosed in the applied reference.

Biancalani discloses a pressing iron having a first reservoir 19 integrated into the body of the iron at the front thereof and a removable container 27 that acts as a second reservoir and is provided with a tubular mouth 27A capable of penetrating through a hole 17A of an end wall bordering first reservoir 19. Container 27 is insertable into a seating 15 provided in the iron. Reservoir 19 is in communication with a drip device plug 37 disposed in the front part of the iron.

In the explanation of this rejection, the examiner asserts that container 27 is "provided with a filling opening 27 located on the rear face of the iron". This assertion is not supported by the reference disclosure. Container 27 does not have a filling opening that is located at the rear face of the iron. Rather, container 27 will be filled, after it has been removed from the iron, by removing cartridge 9 from the tubular mouth 27A and then filling the container through the resulting opening. Tubular mouth 27A will face toward the front of the iron when the container has been reinserted. Thus, container 27 does not have a filling opening located at the rear of the iron.

Further, contrary to the assertion presented in support of the rejection, this reference does not disclose the feature of claim 1 that "said drip device plus is fed by a canalization opening near the rear of the reservoir". The rejection appears to be based on the assumption that container 27 can be equated to a part of the claimed reservoir and also to the claimed canalization. It is submitted that this is not a correct analysis of the relation between claim 1 and the disclosure of the reference. Claim 1 clearly defines a canalization that is an element different from the reservoir. One feature of the claimed canalization is that it opens near the rear of the reservoir. It is not possible for the same

component, i.e. container 27, to be viewed as opening near the rear of itself.

Furthermore, the explanation of the rejection does not clearly indicate the exact manner in which the reference structure is being compared with claim 1. If the claimed water reservoir is being equated to tank 19 and container 27, then the rejection cannot be maintained because this reservoir does not have a filling opening located on the rear face of the iron and does not have a canalization that is a component different from the container itself.

If, on the other hand, it is tank 19 that is being equated to the claimed water reservoir, then this tank does not have a filling opening located on the rear face of the iron, and does not have any canalization.

Thus, regardless of which interpretation is being relied upon by the examiner, this reference cannot be considered to anticipate claim 1.

Claim 2 distinguishes even more clearly over Biancalini reference by its recitation that the canalization opens into the lower rear part of the reservoir. A canalization having that characteristic clearly does not exist in the iron disclosed in that reference.

The rejection of claim 3 as unpatentable over Fauveau in view of Morton is also respectfully traversed.

Since claim 3 depends from claim 1, claim 3 should be considered allowable in view of its dependency.

In addition to the differences already discussed above between the pressing defined in claim 1 and the disclosure of Fauveau, Morton also does not disclose a canalization as defined in claim 1. Furthermore, although Morton discloses a filling opening at the rear of the reservoir, this iron is filled while in its horizontal position, and cannot be filled while being rocked forward. Finally, it would make no sense to prolong the filling opening of Faveau in the manner defined in claim 3 because this would not produce any useful result.

Turning now to the rejection of claims 1-3, 5 and 6, as being unpatentable over Augustine in view of Morton, Augustine discloses an iron having a water reservoir 46 provided with filling passages 100 disposed at the front face of the iron and through which water is introduced into the reservoir while the reservoir is placed vertically on its heel 56. Reservoir 46 is in communication with a valve assembly 116, 118 (specification, column 3, lines 10-25), which is the only component that can be compared with a drip device plug. This assembly is disposed in the front part of the iron is not fed by tubes 186, 192 (reference numeral 196 identifies a pair of semi-circular recesses). Water flows from the valve

assembly through a **conduit 112 having an outlet 114** to steam chamber 38 (specification, column 3, lines 14-19). Please note that conduit 112 is **not** a drip valve.

Thus, contrary to the interpretation on which this rejection is based, outlet 114 is not a drip device plug and the only component of Augustine that can be considered to be such a plug is valve assembly 116, 118, which is **not** fed by canalization in the reservoir. Tubes 182 and 192, on the other hand, are provided to cooperate with a manual pump 150 in order to abruptly supply a large quantity of water to a second steam chamber in order to provide instant extra steam. This second steam chamber is located behind steam chamber 38 (specification, column 4, lines 25-31).

There is nothing in the disclosure of this reference to even suggest that tube 186 is connected to outlet 114 of conduit 112 (which was equated in the action to the claimed drip device plug) or to suggest that valve assembly 116, 118 is fed by any canalization.

Stated in other terms, this reference does not disclose a canalization that opens near the rear of the reservoir and that feeds a drip device plug.

It should thus be readily apparent that even if the filling opening of Augustine were repositioned according to

the teachings of Morton, the pressing iron defined in application claim 1 would not result.

It might also be mentioned, for the sake of completeness, that the purposes of the present invention are also not achieved by the steam iron of Morton. Specifically, if the iron of Morton were rocked forward during filling, water could enter openings 69 in baffle plate 68, then flow through the interior of steam dome 67 into vent tube 64, and from there into the steam chamber.

Moreover, no proper basis has been established for the proposition that would somehow be obvious to reposition and redesign the filling orifices of Augustine in accordance with the teachings of Morton. In fact, it is clearly contrary to the teachings of Augustine to place a filling opening at the rear face of the iron, since this would require a complete redesign of that iron and would defeat the object of being able to fill the iron while it is resting on its heel, which was clearly the mode of filling contemplated by Augustine.

In any event, the rejection must be withdrawn because neither of the applied references discloses feeding a drip device plug by a canalization opening near the rear of the reservoir.

The rejection of claims 7-9 is traversed for the reason that these claims depend from claim 1 and should be considered allowable along therewith.

Turning now to the rejection of claims 1-3 and 5 as being unpatentable over Debourg in view of Morton, Fig. 3 of Debourg shows a pressing iron having a water reservoir 30 furnished with a filling opening 32 located at the front face of the iron, which would prevent the iron from being filled while in a rocked forward position.

The present invention, as defined in claim 1, is a pressing iron that can be filled in such a manner as to prevent water from flowing into the steam chamber if, during the filling operation, the drip device plug is not closed. This purpose is achieved by the **combination** of a filling opening located in the rear face of the iron so that filling of the reservoir can be carried out by holding the iron lock forward, a drip plug in the front part of the iron, and a canalization that feeds the drip device plug and that opens near the rear of the reservoir. The combination of features for achieving this purpose is not obvious from the applied references. In fact, the improvement achieved by the present invention is not even hinted at by the prior art.

Debourg clearly discloses an iron that is constructed to be filled from the front, which means that the

iron cannot be rocked forward during filling. Water can enter the auxiliary reservoir during filling, and could then flow into the steam chamber if the drip device plug was not previously closed.

The purpose of the present invention is also not achieved by the steam iron of Morton. In that case, if the iron was rocked forward during filling, then, as noted earlier herein, water could enter opening 69 in the output plate 68, then flow through the interior of steam dome 67 into vent tube 64, and from there into the steam chamber.

The fact is that it is not suggested by Debourg, and would be contrary to the teachings of that reference, to locate the filling opening to the rear of the iron, particularly since, apart from the disclosure contained in the present application, those skilled in the art would have absolutely no practical reason to make such a modification. Such relocation of the filling opening of Debourg is, it is submitted, not suggested by the prior art. In fact, the only possible suggestion for this can only be found in the specification of the present application, which means that the conclusion on which this rejection is based is simply the product of hindsight.

Accordingly, it is requested that all of the prior art rejections be reconsidered and withdrawn, that the pending

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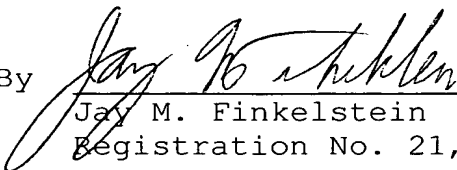
claims be allowed and that the application be found in allowable condition.

If the above amendment should not now place the application in condition for allowance, the Examiner is invited to call undersigned counsel to resolve any remaining issues.

Respectfully submitted,

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